

September 29, 2017

Ex Parte

Marlene H. Dortch, Secretary Federal Communications Commission 445 Twelfth Street, SW Washington, D.C. 20554

Re: IB Docket No. 98-96 – 1998 Biennial Regulatory Review – Review of Accounts of Settlement in the Maritime Mobile and Maritime-Satellite Radio Services and Withdrawal of the Commission as an Accounting Authority in the Maritime Mobile and Maritime-Satellite Radio Services ("2016 Accounting Authority Second FNPRM")

Dear Ms. Dortch:

On September 27, 2017, David Greenhill (President – COMSAT), Sandy Clatworthy (CFO – COMSAT), and Allison Rule (Partner – Marashlian & Donahue, PLLC), representing COMSAT, INC. ("COMSAT"), met with Rachael Bender, Esq., Legal Advisor to Chairman Ajit Pai, with respect to COMSAT's Reply Comments in the above-numbered proceeding and Congressman Posey's correspondence with Chairman Pai.

During the meeting, COMSAT reiterated its support of the Federal Communications Commission's ("FCC" or "Commission") decision to withdraw as accounting authority of last resort and emphasized the very real safety risks inherent in failing to appoint a replacement default authority upon the Commission's exit from the role.

As demonstrated by COMSAT in its Reply Comments and by Congressman Posey in his correspondence with Chairman Pai, appointing COMSAT as the default accounting authority is in the best interest of the Commission, taxpayers, and the industry and presents a commonsense and cost-effective approach to close this long-pending proceeding.

Pursuant to Section 1.1206(b) of the Commission's rules, a copy of this letter is being electronically submitted into the record of these proceedings and provided to the Commission participants. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

COMSAT, INC.

By:

Allison D. Rule Marashlian & Donahue, PLLC 1420 Spring Hill Road, Suite 401 Tysons, VA 22102

Tele: (703) 714-1312 Fax: (703) 563-6222

E-Mail: adr@commlawgroup.com

Its Counsel

cc: Rachael Bender, Esq.